

Exhibit D

1. According to a lawsuit filed in the Eastern District of New York, on November 15, 2012, described in paragraph 2 in Exhibit C, Mr. Kevin White was choked and tased three times while at the police station. Mr. White settled his lawsuit for \$6,500. White v. The City of New York et al., Dkt. No. 15-CV-00270, paragraphs 39 - 42, available at

<https://www.documentcloud.org/documents/4920403-White-v-The-City-of-New-York-et-al.html>

2. According to a lawsuit filed in the Eastern District of New York, on December 25, 2012, Mr. Derrell Davantes was at his home in the East Williamsburg neighborhood of Brooklyn when officers came to the door looking for Mr. Davantes' friend. Mr. Davantes told the officers they could not enter the home without a warrant, to which one of the officers responded "Fuck that," then tased Mr. Davantes and slammed him to the ground and handcuffed him. Mr. Davantes settled his lawsuit for \$10,000. Davantes v. Alamrani et al., Dkt. No. 15-CV-07170, paragraph 16, available at <https://www.documentcloud.org/documents/4921406-Davantes-v-Alamrani-et-al.html>

3. According to a lawsuit filed in the Eastern District of New York, on July 19, 2013, Ms. Melissa Abram went to the 81st Precinct near her home in the Bedford Stuyvesant neighborhood of Brooklyn to make a complaint concerning her landlord. After she used a side door to the precinct, a group of officers yelled at her, ordered her to exit through the front door, and then shot her with a Taser. The Taser darts entered Ms. Abram's body on her left breast and her neck, locations the manufacturer of Tasers warns Taser operators to avoid. Ms. Abram settled her lawsuit for \$25,000. Abram v. City Of New York et al., Dkt. No. 16-CV-05682, paragraphs 19-24, available at <https://www.documentcloud.org/documents/4923098-Abram-v-City-Of-New-York-et-al.html>

4. According to a lawsuit filed in the Eastern District of New York, on April 2, 2014, Mr. John Scott was with his fiancé, Rosanna Fernandez, at her apartment in the Astoria neighborhood of Queens, when several officers came to the door, demanded entry, and violently burst into the apartment. The officers beat, tased, and pepper-sprayed Mr. Scott to such an extent that the officers apparently believed he was dead. The lawsuit was pending as of July, 30, 2019. Scott et al. v. The City Of New York et al., Dkt. No. 16-CV-00834, paragraph 49, available at <https://www.documentcloud.org/documents/4922064-Scott-et-al-v-The-City-Of-New-York-et-al>.

5. According to a lawsuit filed in the Eastern District of New York, on July 22, 2014, described in paragraph 23 in Exhibit C, David Jones and Proctor Martin choked and tased by NYPD Officers. Mr. Jones and Mr. Proctor settled their lawsuit for \$145,000. Jones v. City of New York, 15-CV-5230, paragraphs 28-32, available at <https://www.documentcloud.org/documents/4921037-Jones-et-al-v-City-of-New-York-et-al>.

6. According to a lawsuit filed in the Southern District of New York, on July 27, 2014, described in paragraph 24 in Exhibit C, Mr. Dytrel was tased multiple times by NYPD officers. The plaintiffs settled this lawsuit for \$85,500. Jackson et al. v. Skehill et al., Dkt. No. 15-CV-04987, paragraphs 131-33, available at

<https://www.documentcloud.org/documents/4920998-Jackson-et-al-v-Skehill-et-al>.

7. According to a lawsuit filed in the Eastern District of New York, on August 14, 2014, Mr. Thomas Black, an African American man, was riding his bicycle in the Brownsville neighborhood of Brooklyn when an unmarked car started following him. Mr. Black was tased after pulling into a NYCHA property and getting off his bike with his hands up. Mr. Black settled his lawsuit for \$25,000. Black v. The City of New York et al., Dkt. No. 15-CV-05419,

paragraphs 24-25, available at https://www.documentcloud.org/documents/4921064-Black-v-The-City-of-New-York-et-al_.pdf.

8. According to a lawsuit filed in the Eastern District of New York, on August 29, 2014, Mr. Anthony Greene was at home with his family in Brooklyn when officers forcibly entered their home, violently removed members of the family from the home, and repeatedly stunned him in the back with a Taser. Mr. Greene suffered a heart attack and extreme hypertension as a result of being tased. The lawsuit was pending as of July, 30, 2019. Greene et al. v. The City of New York et al., Dkt. No. 15CV06436, paragraphs 32, 40, available at https://www.documentcloud.org/documents/4923159-Greene-et-al-v-The-City-of-New-York-et-al_.pdf.

9. According to a lawsuit filed in the Southern District of New York, on November 15, 2014, Mr. Robert Ellis, an African-American man, was leaving a nightclub in the West Village neighborhood of Manhattan with his girlfriend. Officers began to arrest Mr. Ellis' girlfriend, and upon Mr. Ellis pleading with the officers not to arrest her, the officers struck Mr. Ellis with their batons and then tased him. At no point did Mr. Ellis in any way resist, obstruct, hit, or attempt to hit or grab the officers. Mr. Ellis settled his lawsuit for \$15,000. Ellis v. City Of New York, et al., Dkt. No. 15-CV-06822, paragraph 25, available at https://www.documentcloud.org/documents/4921337-Ellis-v-City-Of-New-York-et-al_.pdf.

10. According to a lawsuit filed in the Southern District of New York, on February 7, 2015, Mr. Tyrone Gray was on the sidewalk in the Wakefield neighborhood of the Bronx when officers approached and searched him for firearms. After failing to find firearms or other contraband, the officers arrests Mr. Gray under the false pretense that there was an open warrant on Mr. Gray. The officers repeatedly tased Mr. Gray until he was unable to get up. Mr Gray

settled his lawsuit for \$20,000. Gray v. City Of New York et al., Dkt. No. 16-CV-00663, paragraph 14, available at <https://www.documentcloud.org/documents/4921999-Gray-v-City-Of-New-York-et-al>.

11. According to a lawsuit filed in the Southern District of New York, on February 18, 2015, Mr. Kezian McDaniel was drinking a cup of coffee in front of his home in the Alphabet City neighborhood of Manhattan, when two officers from the Warrants Section of the NYPD approached Mr. McDaniel with Tasers in their hands. The officers did not ask for identification and mistook Mr. McDaniel for someone named Jonathan Jones who was wanted by the NYPD. The officers tased Mr. McDaniel, causing him to defecate in his pants, and then arrested him. The officers fabricated a story that Mr. McDaniel had resisted arrest and had possessed a gravity knife in order to cover up their own misconduct. Prosecutors eventually moved for dismissal of the charges. Mr. McDaniel settled his lawsuit for \$30,000. McDaniel v. City Of New York, et al., Dkt. No. 15-CV-06868, paragraph 15, available at <https://www.documentcloud.org/documents/4921345-McDaniel-v-City-Of-New-York-et-al>.

12. According to a lawsuit filed in the Eastern District of New York, on May 1, 2015, Mr. Marcus Bonner, an African American man, was outside on the sidewalk in the East New York neighborhood of Brooklyn, when three NYPD officers approached and assaulted him. One of the officers tased Mr. Bonner's back, and then deployed the Taser again in the touch stun mode for a minimum of two more cycles. Mr. Bonner settled his lawsuit for \$250,000. Bonner v. City of New York et al., Dkt. No. 16-CV-00368, paragraphs 13-15, available at <https://www.documentcloud.org/documents/4921954-Bonner-v-City-of-New-York-et-al>.

13. According to a lawsuit filed in the Eastern District of New York, on June 8, 2015, Mr. Mario Ocasio began acting strangely when his girlfriend called for an ambulance to transport

Mr. Ocasio to a hospital. More than ten uniformed NYPD officers responded, along with EMTs, and the officers attempted to arrest Mr. Ocasio by beating him and tasing him twice, leading to his death. The lawsuit was pending as of July, 30, 2019. Pagan v. The City of New York et al., Dkt. No. 15CV05825, paragraphs 79-82, available at

<https://www.documentcloud.org/documents/4922150-Pagan-v-The-City-of-New-York-et-al.html>

14. According to a lawsuit filed in the Southern District of New York, on July 1, 2015, Mr. Anthony Andre Paul was at his residence in the Bedford Park neighborhood of the Bronx, when officers responded to a report that Mr. Paul was in an emotionally disturbed state. The officers forced entry into Mr. Paul's room and tased him thirteen separate times, at times using two Tasers at once in violation of NYPD Patrol Guide Section 212-117. The officers failed to reassess Mr. Paul's condition after each electrical discharge, as is required by the Patrol Guide. The excessive Taser use was a cause of Mr. Paul's wrongful death. The lawsuit was pending as of July, 30, 2019. Paul et al. v. City Of New York et al., Dkt. No. 16-CV-01952, paragraphs 56-58, available at <https://www.documentcloud.org/documents/4922287-Paul-et-al-v-City-Of-New-York-et-al.html>.

15. According to a lawsuit filed in the Eastern District of New York, on September 19, 2015, Mr. John Scoma was at his home with his wife in the Dyker Heights neighborhood of Brooklyn when NYPD officers entered his home suddenly and tased Mr. Scoma twice while arresting him. The lawsuit was pending as of July, 30, 2019. Scoma v. City of New York et al, Dkt. No. 16-CV-06693, paragraph 16, available at

<https://www.documentcloud.org/documents/4923523-Scoma-v-City-of-New-York-et-al.html>

16. According to a lawsuit filed in the Eastern District of New York, on or about October 12, 2015, Mr. Shatee Denmark was sitting outside in the Fort Greene neighborhood of

Brooklyn, when officers approached him and asked for his identification. Mr. Denmark did not have his identification on him, but he gave his name to the officers to check for outstanding warrants. Officers told Mr. Denmark that he had a warrant, which Mr. Denmark believed was a mistake, but he allowed himself to be arrested. The officers falsely claimed Mr. Denmark was resisting arrest and then shot Mr. Denmark with a Taser. The lawsuit was pending as of July, 30, 2019. Denmark v. City of New York et al., Dkt. No. 18-CV-01224, paragraph 18, available at <https://www.documentcloud.org/documents/4928428-Denmark-v-City-of-New-York-et-al>.

17. According to a lawsuit filed in the Eastern District of New York, on November 28, 2015, Mr. Tony Holley was walking on the sidewalk in the Jamaica neighborhood of Queens when three NYPD officers approached him with their weapons drawn. The officers tased Mr. Holley in his chest despite training bulletins from the maker of Tasers instructing officers to avoid shooting suspects in the chest with a Taser. Mr. Holley settled his lawsuit for \$70,000. Holley v. The City of New York et al., Dkt. No. 17-CV-00278, paragraphs 16-18, available at <https://www.documentcloud.org/documents/4923611-Holley-v-The-City-of-New-York-et-al>.

18. According to a lawsuit filed in the Southern District of New York, on January 12, 2017, Mr. Shamir Batista was approached by two plainclothes officers who appeared menacing in nature and did not announce themselves as officers, and when Mr. Batista took a defensive stance, the officers tackled him, struck him, and tased him. The lawsuit was pending as of July, 30, 2019. Batista v. New York Police Department et al., Dkt. No. 17-CV-01994, Facts, available at <https://www.documentcloud.org/documents/4925463-Batista-v-New-York-Police-Department-et-al>.

19. According to a lawsuit filed in the Eastern District of New York, on January 2, 2017, Mr. Igal Sagy was in the Crown Heights neighborhood of Brooklyn, when officers tased

and beat him in front of his children. The lawsuit was pending as of July, 30, 2019. Sagy v. City of New York et al., Dkt. No. 18-CV-01975, Section II.D and Notice of Claim paragraph 3, available at <https://www.documentcloud.org/documents/5379242-Sagy-v-City-of-New-York-et-al.html>.

20. According to a lawsuit filed in the Southern District of New York, on January 14, 2017, Jarzette Jacobs and her son, Jah'Lire Nicholson were inside their home in the Laurelton neighborhood of Queens when a group of uniformed NYPD officers kicked open their door. Mr. Nicholson had a screwdriver in his hand at the time the officers arrived, but officers did not instruct him to drop the screwdriver. The officers fired Taser barbs in Mr. Nicholson's direction, but Mr. Nicholson moved away from the officers and the Taser barbs, at which time one of the officers shot and killed Mr. Nicholson with a firearm. Ms. Jacob's lawsuit was pending as of July, 30, 2019. Jacobs et al v. City of New York et al., Dkt. No. 18-CV-03275, paragraph 24, available at <https://www.documentcloud.org/documents/4928511-Jacobs-et-al-v-City-of-New-York-et-al.html>.

21. According to a lawsuit filed in the Eastern District of New York, on February 20, 2017, Mr. Orlando Marmolejo was buying a cup of coffee at a Dunkin Donuts in the Carroll Gardens neighborhood of Brooklyn when several police vehicles arrived. The officers ordered Mr. Marmolejo to leave. At first Mr. Marmolejo asserted his right to stay, but then he followed the officers' instructions to leave the store. As Mr. Marmolejo walked away from the store, the officers tased him, placed him in handcuffs, and took him to the hospital, but never charged him with any offense. Mr. Marmolejo settled his lawsuit for \$57,500. Marmolejo v. City of New York et al., Dkt. No. 17-CV-07517, paragraph 19, available at

<https://www.documentcloud.org/documents/6428559-Marmolejo-v-City-of-New-York.html>.

22. According to a lawsuit filed in the Eastern District of New York, on May 19, 2017, Mr. Ramon Abreu was in front of the Bushwick Houses in the Williamsburg neighborhood of Brooklyn with several other people listening to music from a boom-box speaker. Police arrived and asked Mr. Abreu to turn off the music, and he complied. The officers then demanded that Mr. Abreu hand over the speaker, and when Mr. Abreu stated that he had turned off the music, the officers grabbed him, attempted to tase him, and hit him in the head with the handle of the Taser. Mr. Abreu settled his lawsuit for \$15,000. Abreu v. City of New York et al., Dkt. No. 17-CV-07145, paragraphs 21-22, available at

<https://www.documentcloud.org/documents/4928227-Abreu-v-City-of-New-York-et-al.html>.

23. According to a lawsuit filed in the Eastern District of New York, on July 31, 2017, Mr. Dwayne Randy Jeune was at his home in the East Flatbush neighborhood of Brooklyn when officers responded to a 911 call characterizing Mr. Jeune as emotionally disturbed. The responding officers were armed with Tasers and discharged them without reason or provocation, striking Mr. Jeune. The complaint goes on to describe that officers beat Mr. Jeune and eventually shot him five times with a firearm, resulting in his death. The lawsuit was pending as of July, 30, 2019. Jeune v. The City of New York et al., Dkt. No. 18-CV-01305, paragraphs 24, 27-29, available at <https://www.documentcloud.org/documents/5379229-Jeune-v-The-City-of-New-York-et-al.html>.

24. According to a lawsuit filed in the Eastern District of New York, on September 16, 2017, Mr. Andre Lawson was at his home in the East New York neighborhood of Brooklyn when he fell in the shower and suffered a laceration to his back. His girlfriend believed he needed stitches and called 911, but by the time EMTs arrived, Mr. Lawson had decided he did not want to go to the hospital. Officers arrived and ordered him to get into the ambulance, and

when he requested to get a shirt before leaving for the hospital, the officers refused, grabbed him, threw him to the ground, beat him, and tased him. Mr. Lawson settled his lawsuit for \$15,000. Lawson v. City of New York et al., Dkt. No. 17-CV-07501, paragraph 27, available at <https://www.documentcloud.org/documents/4928247-Lawson-v-City-of-New-York-et-al>.

25. According to a 2016 news report by the New York *Times*, NYPD officers shoot Tasers “usually to subdue unarmed people or those already in custody, not to stop someone who has put the life of an officer or someone else in peril.” The report cited an example of an incident in 2014 when an NYPD officer fired a Taser at a mute autistic man after he flailed his arms and was uncooperative. See Joseph Goldstein, *New York Police Embracing a Weapon They Have a Complicated Past With: Tasers*, N.Y. Times (Jul. 27, 2016), <https://www.nytimes.com/2016/07/28/nyregion/new-york-police-embracing-a-weapon-they-have-a-complicated-past-with-Tasers.html>.

26. According to a 2017 news report by The Root, a video surfaced showing two NYPD officers dispersing high school students who were standing on a sidewalk near their school. The video shows that the officers followed the students, pushed them, taunted them, and then one of them unholstered his Taser and threatened the students, saying “You wanna ride the lightning?” See Breanna Edwards, *‘You Wanna Ride the Lightning?’ NYC Cops Heard in Video Threatening Students With Taser*, The Root (Apr. 4, 2017), <https://www.theroot.com/you-wanna-ride-the-lightning-nypd-cops-heard-on-camera-1793985698>.